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By ECF

December 2, 2021

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: New York City Policing During Summer 2020 Demonstrations,
No. 20 Civ. 8924 (CM) (GWG)

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York and I am among counsel for the defense in the above-referenced matter. I write in accordance with Rule 2.A of the Court's Individual Practices to respectfully request that the Court permit Defendants to submit a letter in opposition to Plaintiffs' December 1, 2021 Letter Motion to Compel (Dkt. # 324) on Monday, December 6, 2021. Counsel for Plaintiffs do not consent, stating "Plaintiffs do not consent to further delay in resolving this straightforward issue, as Defendants have been informed of the substance of Plaintiffs' position since November 18 and have had the text of Plaintiffs' letter motion in substantially complete form since November 24."

The reason Defendants request an extension of just one business day to respond is due to the fact that members of the team handling these cases for this office have a number of previously scheduled commitments for both today and tomorrow in both these cases and other non-consolidated cases arising out of the Summer 2020 protests, including, but not limited to, the preparation and deposition of an NYPD Chief, the Reply Memorandum for Defendants' Motion to Quash (due tomorrow, December 3, 2021) and an Initial Conference. Just one extra business day to respond to this Motion will allow the team to both comply with its other commitments and reply to Plaintiffs' assertions in a thoughtful and complete manner.

Thank you for your consideration herein.

Respectfully submitted,

Dara L. Weiss s/

Dara Weiss

Senior Counsel

Special Federal Litigation Division

cc: ALL COUNSEL (via ECF only)